




THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Commercial Fisheries Entry Commission

8800 Glacier Highway, Suite 109
PO Box 110302
Juneau, Alaska 99811-0302
Main: 907.789.6160
Licensing: 907.789.6150
Fax: 907.789.6170

To: Glenn Haight, Executive Director
Alaska Board of Fisheries
Alaska Department of Fish & Game

Date: February 9, 2016

 From: Bruce Twomley, Chairman
Benjamin Brown, Commissioner
Commercial Fisheries Entry Commission

Subject: Proposals 22, 23, 24, 149, and 189 for
the 2015/2016 Alaska Peninsula/Bering
Sea – Aleutian Islands/Chignik meeting

This memorandum provides comments on proposals the Alaska Board of Fisheries (Board) will consider at the February 2016 meeting for Alaska Peninsula/Bering Sea – Aleutian Islands/Chignik Finfish in Anchorage.

In addition to these comments, CFEC has submitted a report that we anticipate will help the Board. Titled *CFEC Permit Holdings and Estimates of Gross Earnings in the Chignik and Alaska Peninsula Commercial Salmon Fisheries, 1976 - 2014* (CFEC Report No. 16-01N), the report provides summary information on entry permit holdings, fishery participation, and ex-vessel earnings in each of the Chignik and Alaska Peninsula commercial salmon fisheries.

Proposals 22, 23, and 24

Proposals 22, 23, and 24 seek to redo the administrative area for certain portions of the waters on the north side of the Alaska Peninsula. CFEC has no basis for supporting or not supporting the proposed changes at this time. CFEC will pay close attention to information presented at the meeting and should the Board pass the proposal(s), the Commission would then be able to act accordingly to consider making companion changes to CFEC regulations if determined to be necessary and consistent with the purposes of the Limited Entry Act.

Proposal 149

Proposal 149 seeks to make changes to the definition for administrative area T in order to establish a directed sockeye salmon fishery in the Cinder River Section. CFEC has no basis for supporting or not supporting the proposal at this time. CFEC will pay close attention to information presented at the meeting and should the Board pass the proposal, the Commission

would then be able to act accordingly to consider making companion changes to CFEC regulations if determined to be necessary and consistent with the purposes of the Limited Entry Act.

Proposal 189

Proposal 189 seeks to allow 'dual permit vessels' in the Alaska Peninsula salmon purse seine fishery, with a concomitant increase in the length of seine net from 250 fathoms to 300 fathoms for those vessels. As proposed, the 'dual' permits would be forever locked together so as to not be unlocked or capable of being individually transferred to other persons.

CFEC has no statutory authority to lock two entry permits together. And so far, CFEC has not been persuaded to seek such statutory authority.

In general, CFEC supports restructuring changes that will improve conditions in salmon fisheries and promote resource conservation. Dual permit operations, where two permit holders combine to fish less than two full complements of gear, may have potential to achieve that. However, there are concerns that the second permit in a dual operation may come from a person who otherwise would not be present in the fishery (i.e.; a "latent" permit). We note that the Alaska Peninsula salmon purse seine fishery (S01M permit) has a high rate of latency – consistently 50% or more of the S01M permits have not been fished in the past ten years. Under this proposal, both the total of purse seine vessels and the sum amount of net fished would be increased over current levels if all S01M seine permits converted to dual-permit and seine net length increased by 20%.

Thank you for accepting these comments. We are interested in other comments submitted to these and other proposals, and will monitor the information presented at the meeting.